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*Attorneys for Plaintiffs*

iBeauty Limited Company,  
Dongguan Xianghuo Trading Co., Ltd.,  
Dongguan Laiyang Trading Co., Ltd.,  
Guangzhou Linyu Trading Co., Ltd.,  
Guangzhou Lincan Electronic Technology Co., Ltd., and  
Guangzhou Senran Electronic Technology Co., Ltd.

**IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

iBeauty Limited Company,  
Dongguan Xianghuo Trading Co.,  
Ltd., Dongguan Laiyang Trading  
Co., Ltd., Guangzhou Linyu Trading  
Co., Ltd., Guangzhou Lincan  
Electronic Technology Co., Ltd., and  
Guangzhou Senran Electronic  
Technology Co., Ltd.,

Plaintiffs,

v.

Dbest Products, Inc.,

Defendant.

**CASE NO. 2:24-cv-10694-MWC-JC**

**STIPULATION FOR PLAINTIFFS  
TO FILE THIRD AMENDED  
COMPLAINT**

1 Plaintiffs iBeauty Limited Company, Dongguan Xianghuo Trading Co., Ltd.,  
2 Dongguan Laiyang Trading Co., Ltd., Guangzhou Linyu Trading Co., Ltd.,  
3 Guangzhou Lincan Electronic Technology Co., Ltd and Guangzhou Senran  
4 Electronic Technology Co., Ltd. (collectively, “Plaintiffs”), concurrently submits  
5 this stipulation alongside the filing of the Third Amended Complaint with the  
6 consent of Defendant dbest products, Inc. (“Defendant”).  
7

8  
9 Defendant filed counterclaims along with its answer to the Second Amended  
10 Complaint (Dkt. No. 48). Because those counterclaims assert additional, later-  
11 asserted patents that were not addressed in the initial Complaint or Second  
12 Amended Complaint, Plaintiffs seek to assert new claims for declaratory judgment  
13 relief regarding those newly identified patents. To streamline the pleadings and  
14 avoid unnecessary motion practice, Defendant has consented to Plaintiffs filing a  
15 Third Amended Complaint, attached hereto as Exhibit A.  
16  
17

18 Therefore, Plaintiffs submit this stipulation to confirm that the Third  
19 Amended Complaint is being filed with Defendant’s express written consent in  
20 accordance with Fed. R. Civ. P. 15(a)(2).  
21

22 Additionally, to preserve the existing scheduling order, the Parties have  
23 agreed to an accelerated response deadline for the answer to the Third Amended  
24  
25  
26

1 Complaint and the answer to the Counterclaims. The stipulated response dates for  
2 the respective filings are as follows:

3  
4 Answer to Third Amended Complaint: July 22, 2025

5 Answer to Counterclaims: July 27, 2025  
6  
7

8 Respectfully submitted this 18th day of July 2025.

9 /s/ David Silver

10 David Silver

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16 *Attorneys for Plaintiffs*

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**CERTIFICATE OF SERVICE**

I, David Silver, hereby certify that on July 18, 2025, I electronically filed the foregoing with the Court using the CM/ECF system, and thereby delivered the foregoing by electronic means to all counsel of record.

By: /s/ David Silver  
David Silver